

EXHIBIT 41

1 X06-UWY-CV18-6046436-S : SUPERIOR COURT

2 ERICA LAFFERTY : COMPLEX LITIGATION DOCKET

3 v : AT WATERBURY, CONNECTICUT

4 ALEX EMRIC JONES : OCTOBER 4, 2022

5
X06-UWY-CV18-6046437-S : SUPERIOR COURT

6 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET

7 v : AT WATERBURY, CONNECTICUT

8 ALEX EMRIC JONES : OCTOBER 4, 2022

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10 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET

11 v : AT WATERBURY, CONNECTICUT

12 ALEX EMRIC JONES : OCTOBER 4, 2022

13 BEFORE THE HONORABLE BARBARA BELLIS, JUDGE AND JURY

14 **VOLUME I MORNING SESSION**

15
16 A P P E A R A N C E S:

17 Representing the Plaintiffs:
18 ATTORNEY CHRISTOPHER MATTEI
19 ATTORNEY ALINOR STERLING
20 ATTORNEY JOSHUA KOSKOFF

21 Representing the Defendant:
22 ATTORNEY NORMAN PATTIS

23 RECORDED BY:
24 LINDA COON
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26 LINDA COON, RPR
27 Court Monitor/Court Reporter
400 Grand Street
Waterbury, CT 06702

1 THE COURT: Good morning, Marshal, good morning
2 everyone.

3 Please be seated.

4 ATTY. MATTEI: Good morning, Your Honor.

5 THE COURT: All right. We are here on Lafferty
6 v. Jones. This is week four, day thirteen if we
7 count yesterday's Charge Conference.

8 If counsel could please identify themselves for
9 the record?

10 ATTY. MATTEI: Good morning, Your Honor. Chris
11 Mattei on behalf of the plaintiffs, joined by Alinor
12 Sterling, and Josh Koskoff.

13 ATTY. KOSKOFF: Good morning, Your Honor.

14 ATTY. STERLING: Good morning, Your Honor.

15 ATTY. PATTIS: Norm Pattis, Judge, on behalf of
16 the defendants, Free Speech Systems and Alex Jones.

17 THE COURT: Good morning.

18 And let me just say to the audience, that in
19 accordance with judicial branch policy, only those
20 entities that have been specifically authorized to
21 photograph or film may do so. If anyone violates
22 their policy, their devices will be confiscated and
23 they will be removed from the courtroom.

24 All right. Do we have any -- once again, your
25 jury is here on time. They are a very conscientious
26 group.

27 Do we have any housekeeping matters before we

1 get started?

2 ATTY. MATTEI: No housekeeping matters that we
3 need to deal with now --

4 THE COURT: Oh, good.

5 ATTY. MATTEI: -- but just to give Your Honor a
6 heads up of something we should deal with at some
7 point today, when it make sense, and that is, I
8 understand that Mr. Jones is considering whether to
9 testify, most likely, tomorrow. I've had discussions
10 with counsel about that. It's our view that there
11 should be an offer of proof in light of the
12 various -- as to what he intends to testify about in
13 light of the various rulings, the default, and some
14 of his conduct outside the courtroom during the
15 course of this proceeding.

16 I don't want to speak for Attorney Pattis, but
17 I believe that he agrees that that would be an
18 efficient way to understand precisely the scope of
19 testimony, if any, that Mr. Jones will be permitted
20 to offer. So, I think we can deal with that -- we
21 should deal with that today so that Mr. Jones can
22 consider that, and so that the Court can kind of
23 prepare for that testimony, if any.

24 ATTY. PATTIS: Generally, I resist offers of
25 proof as the Court is interfering with the
26 presentation of a party's case. And I think that we
27 did have that discussion. There would be some use in

1 it, although, you know -- and I had an argument as to
2 why it might not be necessary. So, I think we should
3 argue whether it's necessary. If the Court orders me
4 to give one, I'll give one. And that might be --

5 Certainly, the law of the case is complex.
6 Mr. Jones was advised of it prior to his
7 cross-examination. I certainly wouldn't oppose
8 another advisement of that. I don't think there have
9 been any rulings since his last testimony to add to
10 that, but I think it would be helpful to address his
11 testimony later in the day, Judge.

12 THE COURT: All right. You just let me know
13 when it's a good time. Okay?

14 ATTY. PATTIS: And may we approach briefly just
15 on a quick housekeeping matter?

16 THE COURT: Absolutely.

17 (SIDEBAR).

18 ATTY. PATTIS: You'll probably hear about this
19 from sources other than me, but I wanted you to hear
20 about it from me. I know, apparently he (INAUDIBLE)
21 media here this morning (INAUDIBLE) press conference.
22 It's my understanding that he's giving another one
23 this afternoon. I just don't want you to think that
24 I'm (INAUDIBLE) on anything that is expected.

25 (INAUDIBLE) participate in (INAUDIBLE). I'm
26 informing him of the Court's orders. I've requested,
27 as you suggested, that I do -- not to address jury --

1 the jury at all in his comments. Beyond that, Judge,
2 I don't know what to do but I wanted you to be aware
3 of (INAUDIBLE).

4 THE COURT: Let me know what time it was this
5 morning. I just wonder if any of the (INAUDIBLE)

6 There's Ron. Do they come in that side door
7 too?

8 THE CLERK: Pardon me?

9 THE COURT: They come in that side door?

10 THE CLERK: Yes.

11 THE COURT: And they --

12 THE CLERK: (INAUDIBLE) side door.

13 THE COURT: So, they are not using --

14 THE CLERK: (INAUDIBLE). They are only in the
15 front.

16 ATTY. PATTIS: I got here at 9:05. I came up at
17 9:30, so I know he was out there.

18 THE COURT: Right. But they are not using that
19 entrance (INAUDIBLE). Okay, and you didn't get any
20 notes, right, Ron?

21 THE CLERK: I haven't seen the jury yet today.

22 THE COURT: Oh.

23 THE CLERK: I'm sorry, Judge. I just got a text
24 from the chief marshal that there is a press
25 conference going on right now.

26 THE COURT: That's fine.

27 ATTY. PATTIS: Very well. As we speak.

1 ATTY. MATTEI: I understand that what Mr. Jones
2 said in substance this morning after promoting his
3 book was that the default is a lie. And, also,
4 describe, you know, a history of false flags. I
5 didn't see it. This is what was related to me.

6 ATTY. PATTIS: (INDISCERNIBLE).

7 ATTY. MATTEI: False flags.

8 So --

9 ATTY. PATTIS: At the trial?

10 ATTY. MATTEI: As I said, I didn't see it. But
11 this is part of the reason we think an offer of proof
12 is going to be necessary.

13 ATTY. PATTIS: Well, I'm not -- Texas counsel
14 thinks this is a sanctions hearing on the grounds
15 that he asks questions designed and intended to hold
16 (INDISCERNIBLE). I don't intend to do that.

17 THE COURT: I didn't imagine you would.

18 ATTY. PATTIS: No. I --

19 THE COURT: It didn't even occur to me that you
20 would.

21 ATTY. PATTIS: No. I'm -- but I'm just --

22 THE COURT: Really. That's it.

23 ATTY. PATTIS: Yeah. I mean, I don't think I'm
24 going to get permission to lead him to avoid that.

25 I know what the rules are. I think typically
26 (INDISCERNIBLE) can't avoid them.

27 THE COURT: This is long (INDISCERNIBLE).

1 ATTY. PATTIS: I know what the rules are. And
2 my client will make his choices. And the Court and
3 counsel will do what they think justice requires. I
4 have made it clear what the Court's position is and,
5 candidly, in my view, (INDISCERNIBLE) took liberties
6 that I was surprised were tolerated --

7 THE COURT: Well, Attorney Pattis --

8 ATTY. PATTIS: -- in cross-examination.

9 THE COURT: But, Attorney Pattis, I did not have
10 a contempt hearing when he started --

11 ATTY. PATTIS: I know.

12 THE COURT: -- the plaintiffs ambulance chasers.

13 I was going to raise that as an issue before he
14 testifies, and that he read into that that we are not
15 going to tolerate any further behavior. So --

16 ATTY. PATTIS: (INAUDIBLE).

17 THE COURT: I would have been well within my
18 rights to hold him in contempt -- criminal contempt.

19 ATTY. PATTIS: Judge, you can imagine a universe
20 in which a cautious lawyer might have said something.

21 THE COURT: Right.

22 ATTY. PATTIS: (INDISCERNIBLE).

23 ATTY. STERLING: Your Honor, I think one of the
24 reasons, though, why we need an offer of proof is
25 because we need to -- well, there are some other
26 issues here in terms of, as I understand Attorney
27 Pattis, there is a door-opening argument, and the

1 scope of that, I think is something that needs to be
2 addressed. I believe that Attorney --

3 ATTY. PATTIS: (INDISCERNIBLE).

4 ATTY. STERLING: I believe that part of the
5 door-opening argument may depend on the testimony of
6 the corporate designee, and we would have a response
7 to that, which is the corporate designee binds the
8 corporation. So, I do think that it's something that
9 we may need to spend some time on.

10 I also wanted to say, Your Honor, that I may
11 duck out before the jury comes in and I just didn't
12 want to -- I won't say anything over there but I
13 didn't want to be rude.

14 THE COURT: Okay. Okay.

15 ATTY. PATTIS: All right, Judge.

16 (END SIDEBAR).

17 THE COURT: Why don't we get the jury, Ron.

18 (COUNSEL CONFERRING).

19 (JURY ENTER).

20 THE COURT: Good morning. Good morning. Good
21 morning, on this rainy, Tuesday day. Welcome back,
22 everyone. Good morning. Good morning.

23 Counsel will stipulate that our entire panel of
24 nine has returned?

25 ATTY. MATTEI: Yes, Your Honor.

26 ATTY. PATTIS: Yes, Judge.

27 THE COURT: On time, as always. And we

1 appreciate that.

2 Please be seated. Make yourselves as
3 comfortable as you can when Ron hands out your
4 notepads.

5 Ron has not brought to my attention any notes
6 from any of you, so I will continue to assume that
7 there have been no issues, but if and when you have
8 any issues with anything that you've encountered that
9 needs to be brought to my attention, I know you'll
10 follow the rule that I set out, and I will deal with
11 it appropriately.

12 All right.

13 Whenever you are ready, Attorney Mattei?

14 ATTY. MATTEI: Thank you, Your Honor.

15 The plaintiffs call Francine Wheeler.

16 THE COURT: Very well.

17 Good morning. Just watch your step there.

18 And just remain standing and Mr. Ferraro will
19 swear you in.

20 THE CLERK: Please raise your right hand.

21

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1 F R A N C I N E W H E E L E R,

2 having been called as a witness, was duly sworn,
3 testified as follows:

4 THE WITNESS: I do.

5 THE CLERK: Thank you. You may be seated.

6 I just need for you to state your name, slowly
7 spelling your last name for the record, and the state
8 and county you live in.

9 THE WITNESS: Okay. Francine Wheeler,
10 W-h-e-e-l-e-r, Fairfield, Connecticut. Fairfield
11 County, Connecticut.

12 THE COURT: Okay. If you need to refill your
13 water bottle, of course you help yourself at any
14 time. All right.

15 And you may inquire, Attorney Mattei, whenever
16 you are ready.

17 ATTY. MATTEI: Thanks very much, Your Honor.

18 DIRECT EXAMINATION BY ATTY. MATTEI:

19 Q Good morning, Francine. Good morning everybody.

20 A Good morning.

21 Q Francine, let's do a quick introduction to the jury.
22 You are married to David, who is here who testified earlier
23 in the case; yes?

24 A Yes.

25 Q And have been for a long time?

26 A Friday will be 21 years.

27 Q And you are mom to Ben Wheeler?

1 A Yes.

2 Q And also Nate, and Matt; right?

3 A That's correct.

4 Q All right. So, as we've been doing with all the
5 folks who are here, we've been trying to give the jury a
6 sense of your background, and who you are as a person, and
7 so I would just like you to please give the jury a sense of
8 that, where you grew up, what your family life is like,
9 where you went to school, that kind of thing?

10 A So, I grew up outside of Philadelphia, in a very
11 loud, Italian family, the only girl with three brothers,
12 kind of strict Catholic at the time, kind of lapsed later,
13 but we were funny, we were artistic, we played music, we
14 sang together. My mom is an artist. And, ironically, we
15 lived near Newtown Square, that's where I was born, and then
16 we moved to another county outside of Philadelphia, and I
17 went to school in Newtown, Pennsylvania, and later on, ended
18 up in Newtown, Connecticut. So, at the time when I
19 graduated from high school in Newtown, PA. I went to
20 Allentown College of St. Francis DeSales, which is a long
21 name, but a very tiny little school where I majored in
22 theater and French -- double major.

23 Q Francine, can I stop you for a second?

24 A Yeah.

25 Q You mentioned that you grew up in a big, loud,
26 Italian family, that there was a lot of singing. Tell the
27 jury a little bit about singing, because I understand that's

1 a large part of what you do, and how did that -- how did you
2 get into that?

3 A Well, when kids learn to talk when they are like a
4 year, I was learning to sing. I had always sung. I have
5 been a singer my whole life. I've done other things too
6 with singing, but singing is kind of the core of who I am.
7 And I was about five when my mom said, I think you are going
8 to a singer, because that's all I wanted to do all day and
9 night. My older brothers, much to their chagrin, were
10 listening to me sing Annie over, and over, and over, and
11 over again when I was 13 forever. And then, you know, I got
12 serious about it. I learned to play piano, and I was just
13 wanting to be a performer.

14 Q You said you have three brothers?

15 A Mm-hmm.

16 Q Is your family all still down in the Philly area?

17 A They are all still down in Philly. My parents are
18 still living, and my brothers are all within an hour to
19 fifteen minutes of them. And they think I live in, like,
20 Utah or Europe because I'm so far away from them, but I see
21 them a lot. I see them a lot.

22 Q So, tell me again. You went to St. Francis DeSales
23 College?

24 A Mm-hmm. It's now called DeSales University.

25 Q In Allentown?

26 A Right outside of Allentown. Yeah.

27 Q Okay. And when you -- when did you graduate?

1 A 1989.

2 Q Okay.

3 A A long time ago. Yeah.

4 Q And when you graduated, did you try to make a go of
5 it in singing and the arts?

6 A Yeah. So, my parents redid -- my mom redid my
7 bedroom curtains thinking I would move home, but I said
8 I'm -- my friend got me a singing/waitressing job at
9 Mrs. J's Sacred Cow on 72nd and Broadway, so I'm going to
10 move to New York.

11 Q When you say, singing waitress, are those two
12 different jobs or is it the same job?

13 A Well, it was two things that I had to do, not at the
14 same time. I didn't, like, serve the food and sing, but I
15 served the food and then I would get up a sing a song, and
16 that kind of thing. And I got an agent that way. It kind
17 of started my career in New York, so --

18 Q Was it in Manhattan?

19 A Manhattan. Upper West Side. I lived in a lot of
20 different apartments because I would leave the city and go
21 and do a job. You know, like, I played Maria in *West Side*
22 *Story*, and I, you know, I did a lot of parts like that. It
23 wasn't until later that I focused on commercials, and
24 singing mostly, like, singing commercials and singing with
25 my band -- that happened later.

26 Q Okay. David mentioned that -- I think he mentioned
27 that when he met you, you were singing as part of a Swing --

1 A Yes.

2 Q -- like Jazz outfit?

3 A I had a Trio called Swing Set. And if you are -- if
4 you are old enough to remember, or if not, in the '90s Swing
5 music was very big. And during that time, I thought that if
6 I sang with the big band, I would get a lot of work, and we
7 did. And we recorded music, and we performed every week on
8 46th Street and 8th Avenue, and we had a great A cappella
9 group. So, what happened, was that we had been doing gigs
10 for a while, and my roommate said to me, you know, I know
11 these sketch comedy guys, Ward and Wheeler, and they are
12 looking for a music act for their next variety show, and I
13 said, well, what does it pay? Because for me, it was about
14 how much money I could make because it was a tough business
15 to be in. And she said, well, I don't know what it's going
16 to pay but it could be good exposure. So, I told the girls,
17 and I said, what do you think? Should we do this gig? It's
18 going to be on the Upper West Side, at Citrus Grill, with
19 these guys, I don't know them. And they are, like, well,
20 you know, let's just do it. So, long story short, we did
21 the gig, and I meet this guy who is this kind of goofy,
22 funny guy named David, and I notice that he's really a good
23 guitarist. I said, you know, David, I have an audition next
24 week for this folk musical and I need a guitarist, would you
25 be interested in playing for me? And he said, sure. So,
26 he -- I hired him, we rehearsed the song, we did the
27 audition, and after the audition I got a letter in the mail,

1 and it was this card, and it had a picture of me kind of
2 singing, and him playing guitar. And I was, like, oh my
3 gosh, that looks like David and that looks like me. And I
4 was, like, oh my God, that is us. And my roommate said,
5 well, he totally likes you. And I thought, oh my gosh, I
6 think I like him. But I kind of got excited. And then my
7 phone rang later, and it was David, and I was so excited
8 because I thought he was going to ask me out. And he said,
9 hey, Francine, it's David, listen, um -- I was like, yeah.
10 I, uh -- I was wondering, Dave -- Jamie and I have a gig
11 this Friday. And I was, like, yeah. Would you work the
12 door for us? And I was, like, okay. And I thought, I am
13 really desperate, because I was almost 31 and I had made
14 peace with the fact that I was probably not going to get
15 married because I had spent my life up until that moment
16 really focused on performing, and I didn't really, either --
17 you know, I just didn't have time anymore, and I didn't know
18 if I ever wanted to settle down. But after I met David, and
19 I worked the door that Friday, I kind of knew. It was a
20 weird feeling. And it makes me kind of happy/sad, but I
21 hadn't even kissed him yet, and I knew I had fallen in love
22 with him. And it was kind of a magical time because we
23 didn't -- we were so busy, we didn't even go on our first
24 date for a couple of months after that but I knew I was
25 going to marry him. I didn't tell him that because I didn't
26 want to scare him off, but I knew.

27 Q When he was testifying, he said that, you know, once

1 you and he -- and it sounds like you came to this
2 realization very quickly thought -- once the two of you
3 realized you wanted to be together, he described it as just
4 looking at green lights all the way down for the two of you.
5 How did you see it once the two of you decided that you were
6 just going to be together?

7 A It was probably within -- about six months into our
8 relationship I knew that we were going to be together -- or
9 he knew by then. And the way we look at it was, it was the
10 timing was right because we were not just in love, but we
11 were both kind of tired of the business, and we both wanted
12 to have marriage and kids. Like, it was just something that
13 I knew I wanted to do and didn't before that. I just could
14 see us being a family. So, it was kind of, like, we just
15 made it happen. And it was easy. It was always easy then.

16 Q And over time, as you guys were figuring out getting
17 out of the business, I figure that's why you ended up
18 looking to move out of the city to somewhere else?

19 A Well, I always say I left the business but I never
20 really did, because I have this kids band at the time, too.
21 A lot of things happened. I did a lot of different
22 performing. We were going to try -- we were looking near
23 Philly to be near my family, but I said to Dave that I kind
24 of want to be near New York, you know, just in case I still
25 want to sing sometimes, you know. And he said, sure. So,
26 we kept looking near New York, but we were struggling
27 performers, and we couldn't afford any place, and we had

1 these friends who had moved to this place called Sandy Hook.
2 And they said, you know, come up here. It's only like an
3 hour and a half from New York. And it was the first place
4 that we could afford to settle and it had really good
5 schools. And I'm kind of skipping ahead because we had kids
6 in the City first before we moved, but --

7 Q That's Nate and Ben?

8 A Nate and Ben. Yeah.

9 Q When did you move?

10 A We moved in 2007, in April, and then by July we
11 rented a little, tiny house, and then by July, we bought our
12 house in Sandy Hook. And Nate was four, and Benny was about
13 eight and nine months old.

14 Q Okay. All right. So, let's go there next. Nate is
15 Ben's older brother, separated by a little over three years?

16 A Yeah. A little over three years.

17 Q And how old is Nate now?

18 A Nate is 19 and a half.

19 Q So, you all move out to Sandy Hook. Tell the jury
20 about Ben. You know what I mean? We heard a little bit
21 about the teeth from David.

22 A Oh, yeah. The biting.

23 Q The biting. But I want -- tell the jury, from your
24 perspective, about Benny growing up, what he was like?

25 A Well, he had -- he had a Lobis face. That's my
26 maiden name, Lobis. And he had this big, bright smile, and
27 rosy cheeks, and he was funny. He was such a funny boy.

1 And he was kind of my Koala bear. Like, he was my kid that
2 if I left the room, he would be, like, where did you go,
3 come back. You know, but he also showed signs early early
4 on that he was musical.

5 I tell this story that we were leaving the
6 doctor's office one day, we were in the elevator, and we
7 left, and we go in the car, and he said, momma, what's that
8 C for in the elevator? And I said, oh, C is usually for
9 like the center floor kind of thing. And he said no, no,
10 no, no. Not that letter, but -- and he hummed a C. Which
11 I'm not perfect pitch, but it was like hmmm. And I said,
12 what? And he said, yeah, the C, hmmm. And so I went home
13 with him and I started saying, sing me a G. And he could
14 sing a G. And he just could sing notes out of the air. And
15 during that time, he was also very obsessed with
16 lighthouses. So, he had to visit lighthouses whenever we
17 moved somewhere, or whenever we -- I mean, not moved
18 somewhere, whenever we went on vacation. We had to visit,
19 we had to tour lighthouses. He had to have a lighthouse on
20 his birthday cake. We had lighthouses all over his and
21 Nate's room. And he was so busy. He never sat. So, he
22 would just run, run, run. Right before he died, he had
23 started to settle down, but we had a -- we had a sticker
24 chart, and one of them was --

25 Q Meaning, you get a sticker if you do something good?

26 A Yeah.

27 Q Okay.

1 A So, he had, like, one that was, like, sitting fully
2 in a chair. That was his biggest accomplishment. He
3 finally did that but, no kicking, licking, or biting, was
4 like a two out of five. Like, he really couldn't -- he did
5 that a lot, so.

6 ATTY. MATTEI: Pritika, can we show a picture of
7 Ben?

8 This is, Your Honor, Exhibit 560. It's a new
9 exhibit.

10 ATTY. PATTIS: 560, sir?

11 ATTY. MATTEI: Yeah. I believe it's without
12 objection.

13 ATTY. PATTIS: No objection.

14 Q So, you are talking about lighthouses. So, this
15 is --

16 A That's Nauset Light in Massachusetts.

17 Q And that's Ben?

18 A Yeah.

19 Q Do you know when about that might have been taken?

20 A I think that was 2011. It could have been the summer
21 of 2012, I'm not sure. It was either 2011 or 2012. He was
22 about -- yeah, he was five, so it must have been about 2012.

23 Q What did he like about lighthouses?

24 A He liked getting to the top of them and seeing out
25 into the ocean. I'm pretty sure that we saw a whale when we
26 were in Massachusetts or, you know, we were at the top. He
27 liked hearing the history and how people would bring in the

1 boats safely. He was loving that captain feeling, like
2 being the beacon, the one that could, you know, stand at the
3 top and help the boats.

4 Q What was -- before he died. So, you know, around
5 this time, 2011, 2012, what was his relationship with Nate
6 like?

7 A So, they were very different boys, but they were best
8 friends. That Nate was always reading, Ben always wanted to
9 be outside. So, we would try and get Ben to sit and read a
10 little bit, and we would try and get Nate out of the house a
11 little bit. And, Benny, even at a very young age, even when
12 he had just turned six a couple months before he died, he
13 was helping Nate get out of his shell because Nate was such
14 an introvert and Ben was, like, come on, Nate, we are going
15 to do this, and we are going to do that, and come on
16 outside. And he had this kind of high-pitched, very, you
17 know, sing-songy voice, and he would convince Nate and
18 nobody else could. You know, so, they had that beautiful --
19 like, I could picture them as grown men being best men at
20 each other's weddings, or Benny visiting Nate at college
21 before he would go. And I just knew that they were best
22 friends, and I never worried about them having a playmate
23 because they always had each other. In fact, Ben was so
24 excited about Nate, I had to stop Ben. He would poke Nate's
25 eyelids in the morning to get him awake. And I would say,
26 you know, you can't wake up your brother Nate. If you do,
27 I'm going to have to put you in another room. He said,

1 please, mommy, don't put me in a different room. I love
2 Nate. You know, so, he did finally stop poking his eyes,
3 but it took a while.

4 Q Did they share a room?

5 A They did.

6 Q So, moving into 2012, Francine. I want to show you
7 another picture just to -- so we can orient the jury in
8 time.

9 ATTY. MATTEI: This is 315.

10 This is by agreement, Your Honor. Already in,
11 I believe.

12 ATTY. PATTIS: Agreed.

13 ATTY. MATTEI: You can pull that up. Thank you.

14 Q So, here we are. When was this picture taken,
15 Francine?

16 A This was just, literally, maybe, a few days, could
17 have been as long as a week before the shooting, because we
18 took that picture quickly on the phones -- one of our
19 phones -- to make a Christmas card.

20 Q Okay.

21 A Yeah.

22 Q That's Nate in the red and Ben in the green?

23 A That's right.

24 Q This is at your home?

25 A Yup. Right in front of the stairs. Mm-hmm.

26 Q Okay.

27 ATTY. MATTEI: Thank you, Pritika. You can take

1 it down.

2 Q Francine, I want you to tell the jury about that
3 morning, the morning of the shooting, and the time that you
4 spent with Ben that day before you sent him off to school?

5 A So, usually, Nate and Ben would get on the bus like
6 normal, and that morning, David and I were rushing, and I
7 said to David, you know, Benny has a little bit of a cough,
8 should we send him to school, what do you think? And he
9 said, oh, he'll be fine, so David left. And unbeknownst to
10 me, he had taken Nate and Ben's backpacks with him because
11 we were switching cars that morning. And when the boys
12 realized that, I said, don't worry, Ben, I'm going to write
13 to Mrs. D'Amato and I'll tell her, you know. And then I
14 said, oh my gosh, guys, I forgot, Nate has Book Club. We've
15 got to get Natie to school. So, I quickly cleaned up, and
16 as I'm stacking the dishwasher, Ben turns to me and he says,
17 mommy, what does forgiveness mean? And I was, like, I don't
18 know, Ben, I'm so busy. No, no. Mommy, mommy, what's
19 forgiveness mean? And I said, I don't know, Ben, it's like
20 when you do something wrong, the other person forgets about
21 it, now come on we got to go. So, we pack up the bags, we
22 get in the car, we drop off Nate at Sandy Hook, and I said
23 to Ben, okay, so, what do you want to do, do you want to go
24 home and wait for the bus, or do you want to go to Starbucks
25 for a treat?

26 A He said, Starbucks, of course.

27 Q And Nate was in third grade?

1 A Nate was in fourth grade.

2 Q Fourth grade?

3 A And Ben was in first.

4 So, we go to Starbucks. He orders a chocolate
5 milk, I get my coffee, we sit down, and he literately turns
6 to me and he says, you know what, momma, I'm going to be an
7 architect when I grow up. And I was, like, wow, okay,
8 that's great. He said, no, no, no, wait. I'm going to be
9 an architect and a paleontologist because Nate is going to
10 be a paleontologist and I have to do everything that Nate
11 does. And I said, well, you know, you are your own person,
12 you don't have to do whatever Nate does. And he said, oh,
13 no, no. I'm always going to be with Nate. I love Nate and
14 I love you, mommy. And I said, I love you too. You know,
15 it's so nice. We never get to be here together you and me.
16 We are always rushing around. And then he said, mommy, I
17 said, yeah, and he said, can I have your iPhone. So, I gave
18 him the iPhone. A few minutes later, I said, all right,
19 buddy, come on, we got to pack up everything and go to
20 school. So, it was about 9 o'clock, and he was so excited
21 to go into school when I was dropping him off around the
22 front, he left the door open, and I said, Benny, close the
23 door. And I don't remember if I said I love you, but I
24 remember saying close the door. That was the last thing I
25 said to him, and then he went in.

26 Q Those moments you spent with Ben at Starbucks, just
27 the two of you, has that become a cherished memory of yours?

1 A Yes. Everybody knows that story who knows us. Yeah.

2 Q As we've been doing with most folks, I'm not going to
3 have you walk me through the rest of that day, but I do want
4 to talk to you, Francine, about the week thereafter. Nate
5 was, obviously, in school though?

6 A Nate was hiding in a box of T-shirts in the supply
7 closet, in the gym, listening to the murders. He heard
8 everything. He was there. If the shooter had turned right
9 instead of left, he would be gone probably.

10 Q In the days after, I understand that you and David,
11 obviously, have a lot of support from friends and family to
12 come help?

13 A We had five years in Newtown and we have had, and
14 have, a community. And, so, they immediately swarmed in and
15 helped us kind of get through -- I mean, I think, press was
16 there by the end of the day before I even officially heard
17 that Ben was gone, so I was having them kind of deal with
18 the press immediately. And by the next day, my friend who
19 was in my singing band with me back in the '90s, one of my
20 closest friends, she was -- she came in and kind of took
21 charge of everything to help with the onslaught of people,
22 and craziness, and the phone ringing. And I had a home
23 number at that time, and it kept ringing.

24 Q David described that at some point, relatively soon
25 after the shooting, people had come to the house claiming --
26 wanting to see Ben --

27 A Yeah.

1 Q -- and falsely claiming to be a reporter, and that
2 one of your friends had helped manage that situation. Is
3 that the same friend you are talking about?

4 A Yes.

5 Q And what's her name?

6 A Kim.

7 Q In the days after the shooting, when did you first
8 learn that there was a lie that had been pushed by Alex
9 Jones concerning what happened to your son, what was
10 happening to you, and these other families?

11 ATTY. PATTIS: Objection to the form. Compound.

12 THE COURT: Overruled.

13 A Benny died on Friday the 14th. By Monday, Kimmy came
14 to us and said, one of the dads of one of the kids who died,
15 his name is Robbie Parker, and he did a press conference,
16 and they are saying things about Robbie that aren't true and
17 there is this guy out there who is saying that Sandy Hook
18 didn't happen, and now they are bombarding Robbie, this dad,
19 with this stuff, and on his page, on his daughter's page.
20 But it was very -- it was probably a few weeks of Kimmy
21 talking to us about it, and I pretty much said, stop, I
22 don't want to know, I can't handle anything right now. All
23 I -- you know, but she did say it very early on. And that
24 she was working behind the scenes to try and keep it away
25 from us as much as possible.

26 Q And when you heard this, I take it -- it sounds like
27 your response was just to say, I don't want to even know

1 about Alex?

2 A I don't want to know. I didn't want to know. Also,
3 you know, I didn't want to know anything about the crime,
4 and I didn't know if I could handle the next minute, so I
5 just wanted to deal with the minute, and I didn't want to
6 know anything outside. I didn't look on the television, I
7 didn't look on the internet. I created a kind of -- I think
8 even David knew more than I did. I just kept a very small
9 room for things.

10 Q When was Ben's funeral?

11 A His visitation was Wednesday night the 19th and his
12 funeral was Thursday morning, December 20th.

13 Q That was at Trinity Episcopal Church in Newtown?

14 A Yes. I was a member of the Trinity. Mm-hmm.

15 Q Did you hear Bill Aldenberg testify in this case that
16 he was assigned to provide security at Benny's funeral?

17 A Yes, but I didn't know. Because that was the
18 funeral -- that was the only funeral at Trinity Episcopal
19 Church was Benny's. I didn't know there was death threats.
20 Kim told me later that was true. I didn't know at the time.

21 Q Moving forward into the first months of 2013 --

22 Are you okay?

23 Moving forward into the first months of 2013,
24 did you, over time, although you were trying to keep
25 yourself in that bubble, start to become aware more about
26 this lie that was being pushed?

27 A Yes. Nate was asked, because he was in fourth grade,

1 and the third and fourth graders were asked to sing in the
2 Sandy Hook choir at the Super Bowl in New Orleans.

3 Q In February of 2013?

4 A That was February of 2013. And at the time, I was
5 still pretty insulated. I didn't know what was really out
6 there, but I remember being nervous about Nate's safety, and
7 my safety, and David's safety. We went to the Super Bowl,
8 and during the Super Bowl, the lights and the electricity
9 went out during the game, and I was pretty terrified that
10 this was the end, that people were going to come hurt us.
11 But it was after the Super Bowl when I actually started to
12 understand something different that was going on.

13 Q And is that because you became aware that Nate had
14 learned about this lie that his brother's death was a hoax?

15 A Yeah. I was trying to keep it from him. He wasn't
16 yet -- he didn't have a phone. He was very limited. He was
17 only nine and a half. And, so, I found out that there was a
18 boy in the choir that they were saying was Ben. And I
19 started to see some of the comments after the Super Bowl
20 and, that we were actors, and that there was this bunch of
21 people who didn't believe that Sandy Hook happened, because
22 look, there is Ben in the choir, Nate's brother, and I was
23 terrified that Nate was going to find out, because I felt
24 like I can ignore this, but I can't have Nate see it. But
25 Natie went on a play date one day, I think it was before his
26 birthday, like, in April, and his friend showed him
27 everything on the internet, and all of the lies they were

1 saying about David and I being actors, and that Ben was
2 alive, that he didn't even exist. That Nate was lying at
3 the Super Bowl. And he asked me, he said, why are people
4 saying this, Mom? I didn't know what to say to him.

5 I mean, I have to say this, because it's really
6 important that, when I say this out loud, I have to also
7 remind myself of this which is, it is one thing to lose a
8 child. There are thousands and thousands of parents who
9 have lost children to guns, to cancer, to many many things,
10 and that's hard enough because you learn to live -- if you
11 are a grieving parent, you learn to live with that. It's
12 quite another thing when people take everything about your
13 boy who is gone, and your surviving child, and your husband,
14 and everything you ever did in your life that is on the
15 internet, and harass you, and make fun of you, because
16 that's something I can't -- I can't fix. I can't make that
17 better for Nate. I can't do that. Forever he has that.

18 Q Francine, I want to show you Exhibit 297 which is in
19 evidence as a photo produced by Free Speech Systems. Do you
20 see this photo, Francine?

21 A Yes.

22 Q And this is a picture of surviving children of Sandy
23 Hook performing at the Super Bowl in New Orleans; right?

24 A Yes.

25 Q And --

26 ATTY. MATTEI: Yeah. Keep going, Pritika.

27 Thanks.

1 I'm going to go --

2 Your Honor, may I go over here? I just don't
3 want to jam in over here.

4 THE COURT: Certainly.

5 Q You can look at your screen, Francine. But you see
6 here, this is your son, Nate?

7 A Yes.

8 Q Okay. Then, here it says, ten Sandy Hook children
9 found alive and well, and they describe another child here,
10 Owen Wright, aka Ben Wheeler; right?

11 A Yes.

12 Q Who had died three months before?

13 A That's what it says.

14 ATTY. MATTEI: And you can pull out of that,
15 please.

16 Q And then here we have Emilie Parker, also according
17 to this, singing at the Super Bowl. Do you see here,
18 Francine, this young boy, Jake Hockley?

19 A Yes. That's Jake.

20 Q Dylan's brother?

21 A Yes.

22 Q Do you see down here, Jesse Lewis; right?

23 A That's --

24 Q Jesse Lewis was killed in Sandy Hook, wasn't he?

25 A That's right. That's not Jesse.

26 Q Is this what Nate was shown by his friend?

27 A Yes. And a lot of comments, and a lot of -- I

1 believe -- a lot of doctored videos of David and me as well.

2 Q You've seen a video of Mr. Jones' broadcast in which
3 he described pictures of children who they say are dead who
4 are still alive?

5 A Yes. I've seen that video.

6 ATTY. MATTEI: Can we pull up, please,
7 Mr. Jones' deposition? It's Exhibit 372.

8 One moment, Your Honor, and I'll get this
9 exhibit number. This will be 372H, Your Honor.

10 I'll offer it as part of Mr. Jones' deposition
11 testimony, page 317, 318.

12 You can pull it up, please?

13 Q *QUESTION: When you say you have a photo of a bunch of*
14 *kids who are still alive that they say died, what photo are*
15 *you talking about?*

16 *ANSWER: I don't remember which one that is.*

17 *QUESTION: Are you talking about the Super Bowl photo*
18 *that Mr. Halbig sent you?*

19 *ANSWER: That might be it.*

20 You said that --

21 ATTY. MATTEI: You can take that down.

22 Q Francine, you said that this was kind of happening in
23 the months after the Super Bowl and that Nate asked you why
24 this was happening; right?

25 A Yes.

26 Q You were here during opening statements?

27 A Yes.

1 Q You see that in April, Mr. Jones published a video
2 which he titled, *Crisis Actors Used at Sandy Hook: Special*
3 *Report*?

4 A Yes.

5 ATTY. MATTEI: I would like to pull up 8B. Your
6 Honor, this is a still shot of that broadcast which
7 is currently in as 8A.

8 ATTY. PATTIS: This is a new exhibit?

9 ATTY. MATTEI: This is a photo of a video that
10 is in evidence. So, it's a still shot of that video.

11 ATTY. PATTIS: So, it is a new exhibit?

12 ATTY. MATTEI: Correct.

13 ATTY. PATTIS: Okay. No Objection, Judge.

14 THE COURT: So ordered.

15 Q And I'm just going to show you a still shot of that
16 broadcast entitled, *Crisis Actors Used At Sandy Hook:*
17 *Special Report*, published in April. April 1, 2013.

18 ATTY. MATTEI: Thank you.

19 Q After -- in the months after Ben's death, did friends
20 of yours start an organization to try to honor Ben?

21 A They actually started it only a few days after the
22 shooting. And it was my community at my church. They put
23 together this idea that they wanted to do something for
24 youth, and they wanted to honor Ben, so I said, we should
25 call it Ben's Lighthouse because he loved lighthouses, and
26 what a beautiful way to remember him. You know, because the
27 symbol of being a beacon. So, they started it to do

1 something. And I say that very loosely, because we did a
2 lot of things then. I didn't start it, so they were doing,
3 like, volunteer work with children, and they would go to
4 different places where they had trauma, and they would help
5 them rebuild houses, and they would, you know, just help
6 different communities. So, early on, after the shooting,
7 before I had some other things that I needed to take care of
8 and do, they ran it for probably a good two years before I
9 became more involved.

10 Q One of the things -- well, during that time period,
11 that two-year time period, you and David decided to try and
12 have another child?

13 A Yes. We were already older parents, and I used to
14 talk to Ben, and I would say, Benny, I know that I can do
15 this, but I need you to help me because I'm 45 years old.
16 And we found a way to have a baby. And I spent most of,
17 probably from the fall of 2013 all the way through Matthew's
18 birth in November, 2014, just focused on that: Getting
19 pregnant, going through the pregnancy, and all of the hard
20 things about being pregnant at such an older age, and then
21 having a healthy baby in November of 2014. So, that was
22 really my focus. That's why my friends were running Ben's
23 Lighthouse for me, and that's why I -- and I insulated
24 myself during that time. I still didn't watch -- from the
25 fall of 2013 and through 2014, I did not do much looking,
26 much involvement of things.

27 Q Matthew was born in late November, 2014?

1 A November 5th, 2014.

2 Q After the months after the shooting, as part of your
3 coming to terms with what happened, did you participate in a
4 radio address?

5 A Yes.

6 Q What was that?

7 A It was in April of 2013. And during that time,
8 between January and probably May -- May/June, I thought that
9 if we had a moment, because I thought people were going to
10 forget about Sandy Hook, so I thought, I wanted to tell the
11 public that I don't want other parents to go through what I
12 went through. And, so, I was asked by President Obama to do
13 his radio address before a vote for expanded background
14 checks in the senate.

15 Q After shootings, one of the things that you felt was
16 important to do, is to help protect other children if you
17 could?

18 A Yes.

19 Q And, so, you supported background checks?

20 A Yes.

21 Q After you had Matt --

22 A Mm-hmm.

23 Q -- and going into 2015, is that when you decided that
24 you wanted to take a more active role in Ben's Lighthouse?

25 A Yes. I sort of, with this new baby, I felt like I
26 had a renewed energy to kind of go back into the world a
27 little bit and start to figure out not to -- I call it kind

1 of like not erasing what happened, not forgetting Ben, but
2 actually learning to live with my grief and with my joy of
3 having this new baby, and my surviving son, and that I could
4 create a new life that was different. Kind of like being
5 born again, but not in a religious sense, more in a living
6 sense. And, so, I got involved with Ben's Lighthouse, and I
7 started to become much more aware of the world around me.

8 Q Can you tell the jury when you became more involved
9 in Ben's Lighthouse, and you were thinking about ways to
10 make it successful in the work that it wanted to do --

11 By the way, and what is the work that Ben's
12 Lighthouse, real quickly? We'll get to it a little bit
13 later, but just so that everybody knows what it is that
14 Ben's Lighthouse does.

15 A Well, our mission has worked with youth to help them
16 develop self-awareness so that they can -- we call it, find
17 and share your light. And, so, finding and sharing your
18 light has to do with becoming -- it's a social/emotional
19 work that we do in our programming to help kids understand
20 themselves, and understand the world, to build stronger
21 communities.

22 Q Find and share your light like the lighthouse?

23 A Yeah. We use literal symbols.

24 Q That makes it easier for kids.

25 A Yes. Yes.

26 Q But as you were starting to try and get in that work
27 and make sure that you could do the work that you wanted to

1 do, did you start to become aware of the extent to which
2 Alex Jones' lies about Sandy Hook had spread?

3 A Yes.

4 Q Can you describe that, please?

5 A It was then, that all those people who had been
6 running Ben's Lighthouse, started to tell me about the phone
7 calls, and the e-mails, and the website, and the social
8 media, and our pages, and everything being attacked all the
9 time, and that they were trying to hide it from me.

10 Everybody was always trying to keep it from me so that it
11 wouldn't interfere with my life. And, so, they said, so,
12 you know, we are always trying to get people more visits to
13 the website, but we are having trouble because of all that's
14 out there, and that is when I started to investigate what
15 was going on out there and I started to Google my name. And
16 that's when I was very -- I remember distinctly not just
17 looking at having a friend trying to help me, but she had a
18 friend at Google who helped me clear my name so that we
19 could get my name connected to Ben's Lighthouse.

20 Q So, let's just explain that. So, the idea is that if
21 somebody kind of seen you being associated with Ben's
22 Lighthouse and Googled you, when they did that, they
23 wouldn't find Ben's Lighthouse, they would find all this
24 other stuff before you being a --

25 A A crisis actor.

26 Q -- a crisis actor.

27 A Mm-hmm.

1 Q And, so, you went to a friend of yours to see if you
2 could make it so that the search results would actually show
3 Ben's Lighthouse rather than these lies but?

4 A Right. Right.

5 Q Okay. Go ahead.

6 A So, she did. And we got my name cleared. It was a
7 miracle. And then, I don't know, it could have been a
8 couple weeks, maybe a month, I have no idea, but it was very
9 shortly after that, it went right back to "crisis actor" and
10 that clearing that happened, they just -- they couldn't make
11 it stop.

12 Q And tell the jury, as you were looking at this, your
13 friend, Kim, had told you, including very shortly after the
14 shooting, that Alex Jones had started lying about this. In
15 encountering this stuff online, did you come to a greater
16 appreciation for Alex Jones and his role in this?

17 A I remember some time in 2015, one night I couldn't
18 sleep, and I watched all of his videos. I wanted to know
19 what he was saying. I wanted to know how he was describing
20 Sandy Hook, why he was saying it, what his show was about.
21 I wanted to know because I couldn't figure out how this
22 happened, and so I watched them all. I watched them all.
23 I've seen all the videos.

24 Q And you told the jury that you have, obviously, done
25 some performing when you were younger. As you were looking
26 online, tell the jury beyond seeing comments about you being
27 an actor and seeing -- tell the jury what happened to you,

1 personally? What were you seeing what was happening with
2 your online stuff you had done?

3 A Well, isn't it -- it's kind of ironic, because I
4 spent my adult career being a performer but a real
5 performer. I loved my life in New York, and I loved what I
6 was doing. Even when I went to Newtown, I was still
7 performing in Newtown. And I had this preschool music
8 following, and I would bring my guitar to the library. I
9 mean, I've always performed, and they took my videos, and my
10 work of 20 years, and they doctored them, and they made fun
11 of them, and they said, look, see, she's an actor. And they
12 took -- they took my identity. They took my identity, and
13 then they took my husband's identity, they took my surviving
14 child's identity who was hiding in the gym. They took it.

15 Q And even when you tried to clean it up, within weeks,
16 it was all right back up?

17 A Yes.

18 Q I do want to show the jury a little bit more about
19 Ben's Lighthouse.

20 ATTY. MATTEI: And this is -- these are Exhibits
21 561, 562, and 563. These are new exhibits concerning
22 Ben's Lighthouse. I believe there's no objection?

23 ATTY. PATTIS: That's correct, Judge. No
24 objection.

25 ATTY. MATTEI: I would offer them, Your Honor.

26 THE COURT: So ordered.

27 Q So, Francine, I just want you to spend a little time

1 talking together jury about Ben's Lighthouse.

2 ATTY. MATTEI: Let's pull up 561. Try 562. I
3 might have given you the wrong order, Pritika. Sorry.
4 I'm trying to get to the main page. 563. Yeah. I
5 gave you the reverse order, sorry. 563. Okay. Here
6 we go.

7 Q All right. So, is this the main page for Ben's
8 Lighthouse?

9 A Yes.

10 Q Okay. *The Isle of Skoo*. Summer camp. This is what
11 it looks like right now if you go to it; right?

12 A Yeah.

13 Q So, tell the jury what this is?

14 A So, during 2015, 2016, 2017, I thought, now that my
15 friends have to kind of hand it over to me, what are you
16 going to do, Francine? So, I have took our mission and I
17 said, well, finding and sharing your light. Maybe I could
18 make it more "Benesk". Maybe I could take that probably,
19 perfect pitch boy who could play the piano, and add music
20 because I know that. I know how to do that. So, I wrote a
21 puppet show, program, and it's called *The Isle of Skoo*
22 because I know Benny had many nicknames, but Skoo was one of
23 my favorite nicknames for him. So, I created -- David
24 designed puppets, and I made this little six-year old puppet
25 lighthouse keeper, who is named Skoo, and he meets all these
26 friends on this isle. And I kind of say that all the
27 friends are different personalities, kind of like,

1 *Winnie-the-Pooh* or *Sesame Street* where you have somebody who
2 is kind of grouchy and angry, and somebody who is shy, and
3 somebody who is a perfectionist. And the children learn
4 about Skoo. And Skoo is kind of like their audience. He
5 asks all the questions that they are thinking. And we
6 developed a camp of mentors and mentees, and now I teach the
7 kids through this program and summer camp, how to find and
8 share your light through music, song, puppetry,
9 volunteerism, and it's still going strong, so.

10 Q Is the idea with these puppets, that children are
11 able to see different ways to express their emotions and
12 it's okay --

13 A Yes.

14 Q -- to express their emotions?

15 A It is. Because that's how you build community. And
16 I thought, maybe -- I don't connect it to the tragedy;
17 however, I do say that one of the ways that I have survived
18 this, is through my amazing Newtown community, and so I want
19 to teach kids about that importance, because that's how you
20 survive something like this. You need those people, and you
21 need to understand people's emotions, and imagine what it's
22 like to be other people. I believe that sincerely.

23 Q Were you here for when we presented Mr. Jones
24 testimony that he was telling his audience that the whole
25 community of Newtown was in on it?

26 A Yes.

27 ATTY. MATTEI: Let's go to the mission page of

1 The Lighthouse. If we can just maybe read that.

2 That would be 562 I think.

3 Just pull up the Mission and Vision.

4 Q And Ben's Lighthouse offers The Isle of Skoo program
5 that empowers children and teens to develop the
6 self-awareness, empathy, and social connections they need to
7 find and share their own light through music, puppetry, and
8 mentorship. We help young people find three unique ability
9 to make a difference in the world, to be beacons of hope and
10 change, to stand tall and shine bright.

11 And this is something that you found a way to
12 honor Ben?

13 A Yes.

14 Q But, even today, and throughout it's existence, Ben's
15 Lighthouse has been targeted by people who believe you are
16 an actor and that Ben never existed; correct?

17 A Correct. Yes.

18 Q And in addition to the online harassment that you've
19 encountered, has this lie, pushed by Alex Jones, made it's
20 way into your interactions with people?

21 A Yes.

22 Q Can you describe what happened to you in May of 2016?

23 A I attended a conference called Circle of Mothers.
24 It's about moms whose kids are killed by guns. And it's an
25 opportunity for moms to be with other mothers that know your
26 pain. Sometimes it's in a conference for helping mothers
27 seek help from Office of Victim Services, and to get your --

1 just to find the support and help that you need to move
2 forward. And, so, I was -- one of the moms from the 26
3 families said you might want to consider going, so I did.
4 The second day of the conference, I was in the elevator, and
5 there was this other woman standing there, and she was
6 sobbing. And I said, I'm so sorry, who did you lose? And
7 she said, my 19-year old son. He was shot and killed, like
8 a robbery in a market, and it happened three weeks ago. And
9 I said, oh my gosh, that's so soon, I'm so sorry. And then
10 she looked at my necklace, and I have a picture of Ben. I
11 have Ben's ashes in a Treble Clef, and I have his picture.
12 And she said, who is that? And I said, that's my son, Ben.
13 He died in his first grade classroom at Sandy Hook School.
14 And she said, what? And I said, yeah. He died at Sandy
15 Hook. And she said, you are lying. That didn't happen.
16 And I said, it did happen. She said, but they said it
17 didn't happen. They said it was all a lie. And I said, who
18 said? And she said, they said. And I said, no, it
19 happened. It really happened. She couldn't talk to me
20 after that. I don't know -- I-- I don't know what she
21 thought in that moment, but I told her it was true.

22 Q And this was a conference for mothers who lost
23 children, to help counsel one another through their loss?

24 A Yes. Yes.

25 Q Francine, you talked earlier about the loss that you
26 suffered with losing Ben --

27 A Mm-hmm.

1 Q -- but, also, the additional experience you've had as
2 you've tried to cope with that loss of living in the world
3 where Alex Jones' lies have spread to such an extent. I
4 want you to tell the jury what -- like, what have you done
5 in response? How have you dealt with this phenomenon out
6 there of people believing that you are an actor, that Ben
7 never existed, that Nate's experience isn't real?

8 A Frankly, to be perfectly frank, the way that we deal
9 with it is that we are in therapy, we have to have security
10 in our house, we have to try and ignore, we have to be
11 vigilant in our social media posts, we have to be vigilant
12 on our website, we have to -- I get support from my
13 community, whether it's emotional support. But it's hard to
14 really describe, because I can never solve it, I can just
15 kind of -- I think of it like plugging a hole where there is
16 a, you know, a leak. But I can't -- I can't solve it, so I
17 just have to -- I have to work through it all the time,
18 through -- from my emotional work and help support my --
19 and also because my son is going to be eight soon. He just
20 found out how Ben died, and I don't yet know how to tell him
21 what's probably going to happen to him at some point because
22 I don't know --

23 Q When people find out that he's Ben's brother?

24 A When they found out that he's Benny's brother, and he
25 starts going online some day, whenever that is, he's going
26 to have to handle it too. And I -- sometimes I worry, you
27 know. My son, Nate, is at college and he remains as

1 anonymous as he can be because he doesn't want people to
2 know.

3 Q Have you tried to hide your identity as well?

4 A I often now use my middle name, Francine Lobis
5 Wheeler, so that it doesn't get as many bad hits as Francine
6 Wheeler.

7 Q You said you got home security. Why did you get home
8 security? What security system are you talking about?

9 A The security system in our house. Because I know
10 that there is brain illness out there, and I know that some
11 of these Sandy Hookers, I've seen it, I've heard it, I've
12 read it. They could hurt us. I don't know. They could
13 hurt us. And we have this little boy at home, and we live
14 in the woods, and it's scary.

15 Q What are your fears for Nate?

16 A Nate suffers from severe anxiety and other ailments
17 partly due to his trauma, partly due to this after-trauma
18 difficult time, difficult world that he has to navigate.

19 Q You are talking about the stuff that this case is
20 about?

21 A Yes. So, I worry about him finding his own identity
22 and what that looks like, because I worry that he's never
23 really going to know how to really trust the world and
24 that's really sad.

25 Q If they tell him that his brother wasn't real?

26 A His best friend wasn't real. His best friend who was
27 killed, wasn't real. His best friend that he heard get

1 killed, wasn't real. That is -- that's devastating. And
2 I'm worried for him.

3 ATTY. MATTEI: That's all I have, Your Honor.

4 Thank you.

5 THE COURT: Attorney Pattis?

6 ATTY. PATTIS: May I have one moment, Judge?

7 THE COURT: Take your time.

8 CROSS-EXAMINATION BY ATTY. PATTIS:

9 Q Miss Wheeler, I represent Alex Jones and Free Speech
10 Systems, Inc., and I wanted to tell you I'm sorry for your
11 loss.

12 A Thank you.

13 Q You say you viewed all the videos that you could
14 find. I presume, this was in 2015 or '16? My notes may be
15 bad.

16 A I think it was 2015.

17 Q And about how many of those were there?

18 A I don't remember. At least a half a dozen.

19 Q Prior to watching those videos of Mr. Jones, did you
20 have any idea what his views were about guns, let's say?

21 A No.

22 Q After watching those videos, did you have any view --
23 idea of his views on guns?

24 A I don't think so. I'm not sure. My focus was on --
25 I don't know is probably the best way I can answer that.

26 Q Have you been present throughout the trial here --

27 A Yes.

1 Q -- in Connecticut? Did you -- you've seen a video
2 where he said, "they are coming, they are coming, they are
3 coming --

4 A Yes.

5 Q -- they are coming for our guns" and he talked
6 about the 2ND Amendment?

7 A Yes.

8 Q Is that one of the videos you first saw when you
9 studied his videos?

10 A Yes.

11 Q Viewing that, did that give you any idea about his
12 views on guns?

13 A Yes.

14 Q And why I believed -- why he asserted that Sandy Hook
15 was a hoax?

16 ATTY. MATTEI: Objection, Your Honor.

17 ATTY. PATTIS: Why he asserted, not believed.

18 THE COURT: Sustained.

19 A Yes.

20 ATTY. PATTIS: Nothing further.

21 REDIRECT EXAMINATION BY ATTY. MATTEI:

22 Q Miss Wheeler, did you bring this lawsuit because
23 Mr. Jones lied about you, your son, and these other
24 families?

25 A Yes.

26 Q Do you care at all what any of his views are on
27 anything other than that?

1 A No.

2 ATTY. MATTEI: I have nothing further, Your
3 Honor.

4 ATTY. PATTIS: Nothing further, Judge.

5 THE COURT: You may step down. Just watch your
6 step.

7 Is this a good time for the morning recess?

8 ATTY. MATTEI: That would be fine, Your Honor.
9 If you would like to do that, that's fine.

10 THE COURT: All right. So, we will take our
11 15-minute recess, and we will come back, let's say,
12 11:35ish. All right.

13 So, Ron will be in charge of your notebooks,
14 and have a nice coffee break.

15 (JURY EXIT).

16 (MORNING RECESS).

17 (IN SESSION).

18 THE COURT: Good morning again, Marshal. Good
19 morning, everyone.

20 Are we ready for the jury?

21 ATTY. MATTEI: We are, Your Honor.

22 THE COURT: All right.

23 Mr. Ferraro, thank you, sir.

24 And, Counsel, you'll let me know when it's a
25 good time to deal with the issues we talked about the
26 on sidebar, whether we let the jurors go for an
27 earlier lunch, or return later from lunch, so that we

1 can do what you said -- or at the end of the day?

2 ATTY. PATTIS: No. I think the end. It's not
3 obvious to me that the plaintiffs will rest today,
4 and so the end of the day would make sense, Judge,
5 rather than the lunch break.

6 THE COURT: Okay. Just, you'll let me know.

7 ATTY. MATTEI: We'll be happy to let you know,
8 Your Honor. And we can even take some guidance from
9 you on whether this is something that you'll want
10 some time to think about, because if so, we can do it
11 earlier. I think we are both ready to go.

12 THE COURT: All right. Whatever. You two talk
13 and let me know when a good time is, and let's just
14 try and make it convenient for the jury. That's my
15 concern.

16 ATTY. MATTEI: Yup.

17 (JURY ENTER).

18 THE COURT: Okay. Welcome back.

19 Please be seated.

20 And counsel will stipulate that the entire
21 panel has returned?

22 ATTY. MATTEI: Yes, Your Honor.

23 ATTY. KOSKOFF: Yes, Your Honor.

24 THE COURT: All right.

25 Attorney Mattei, whenever you are ready, you
26 may call your next witness.

27 ATTY. MATTEI: Thank you, Your Honor.

1 The plaintiffs will present the deposition
2 testimony of Infowars E-Commerce Director, Timothy
3 Früge.

4 THE COURT: And my prior instructions regarding
5 videotaped deposition testimony applies again, of
6 course.

1 (VIDEOTAPE DEPOSITION PLAYED OF TIMOTHY FRUGE).

2 (VIDEO STOPPED)

3 ATTY. MATTEI: Your Honor, one moment, please?

4 I think we may have skipped back.

5 You Honor, just one moment? I'm sorry.

6 THE COURT: Take your time. That's all right.

7 (VIDEOTAPE PLAYED).

8 ATTY. MATTEI: That concludes Mr. Fruge's

9 testimony.

10 THE COURT: All right. So, I wonder if I can

11 make the same request for this videotape?

12 ATTY. MATTEI: Transcript?

13 THE COURT: Yeah. Because I could hear the
14 questions -- I could hear the answers very clearly,
15 but the questions are sort of a struggle for me.
16 There was, like, an echo and some background noise.
17 So, if you could, perhaps, file as an exhibit the
18 corresponding transcript like we did for the other
19 other?

20 ATTY. MATTEI: We will do that. Yut.

21 THE COURT: I appreciate that.

22 ATTY. MATTEI: We definitely will. Thank you,
23 Your Honor.

24 THE COURT: Okay.

25 All righty. You may call your next witness.

26 ATTY. MATTEI: Your Honor, before we do that, we
27 have one other video that we would like to play.

1 This is a video that has been market as Exhibit 592,
2 aired on September 4, 2018, by Infowars as an episode
3 of the Alex Jones show. We are showing a clip from
4 that. This is Exhibit 592, September 4, 2018,
5 concerning Google Analytics.

6 ATTY. PATTIS: No objection.

7 THE COURT: So ordered.
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1 (EXHIBIT 592 PLAYED) .

2 ATTY. KOSKOFF: Call Jackie Joven Barden.

3 THE COURT: Very well.

4 Good afternoon.

5 Be careful when you come up here.

6 And just remain standing, if you would?

7 THE CLERK: Please raise your right hand?

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1 J A C Q U E L I N E B A R D E N,

2 having been called as a witness, was duly sworn,
3 testified as follows:

4 THE WITNESS: I do.

5 THE CLERK: Thank you.

6 You may be seated.

7 I just need you to state your name, slowly
8 spelling your last name for the record, and then the
9 county and state you live in? And just keep your
10 voice up a little bit, please?

11 THE WITNESS: Jacqueline Barden, B-a-r-d-e-n,
12 Fairfield County, Connecticut.

13 THE COURT: Thank you.

14 Just one moment. I'm going to wait for
15 Attorney Pattis.

16 Do you need a moment, Attorney Pattis? Do you
17 need a moment?

18 ATTY. PATTIS: No. I'm fine, Judge. I was just
19 checking a file. That's all. Thank you.

20 THE COURT: Okay.

21 ATTY. KOSKOFF: Shall I proceed, Your Honor?

22 THE COURT: You may.

23 ATTY. KOSKOFF: Thank you.

24 DIRECT EXAMINATION BY ATTY. KOSKOFF:

25 Q Jackie. Thank you.

26 Good afternoon. Sounds so formal.

27 Jackie, could you tell the jury about your

1 background, where do you come from, and your lineage?

2 A I grew up in the Bronx. Both my parents are
3 immigrants. They both are from Ireland. I'm the ninth of
4 ten children. My parents had a very very good relationship.
5 My father was -- worked in the A&P, and always had a second
6 time job. And my mother, when I was little, she ended up
7 working as well. Yeah.

8 Q That's it?

9 A That's it.

10 Q You know, you said, the A&P?

11 A Yeah.

12 Q That was a --

13 A Yeah. He always worked in a supermarket.

14 Q Okay.

15 A He then always did something else. He was a garbage
16 collector on the side, he drove a cab, he cleaned the A&P.
17 I remember as a kid, me and my brother going, you know,
18 10 o'clock on a Friday night, he would be mopping the floors
19 and we would be running around the store.

20 Q Getting the floors all dirty.

21 And, so, how old was your -- if you know, how
22 old was your dad and mom when they came over to this
23 country?

24 A I'm not sure. My father will be 100 next month.

25 Q Oh.

26 A And he came here in 1947, so. And my mom, you know,
27 they both met at the A&P.

1 Q Oh.

2 A They came -- they are from different parts of
3 Ireland, and they met when they were working in the A&P.

4 Q Oh. So, they came over separately --

5 A Yes.

6 Q -- but they met?

7 And I think that a lot of people probably don't
8 know what the A&P is, because I'm not sure.

9 A That's old?

10 Q I'm not sure it's around any -- well, it's?

11 A Vintage.

12 Q Vintage. The A&P was a supermarket chain?

13 A Yes. Yeah.

14 Q And so they didn't know each other in Ireland but
15 they met in the aisles of the A&P?

16 A Yeah. Actually, there was a dance, and my father was
17 very quiet, and my mother needed a date. You didn't go to a
18 dance on your own, so my mother asked him to pick her up and
19 bring her to this Irish dance.

20 Q At the A&P or somewhere else?

21 A No. At like an Irish hall. And, he did that, and
22 they went together, and they, you know, didn't hang out
23 together, he just had to bring her there. And, I don't know
24 after that, they were married six months later.

25 Q Maybe you can get some of the details at his 100th
26 birthday. He's turning 100 when?

27 A He'll been 100, yes. We are having a party for him

1 at my house.

2 Q Okay.

3 A He has nieces coming in from Ireland to celebrate
4 with him.

5 Q Great.

6 And, so, your dad and mom were both Irish
7 immigrants, they got married. They certainly had a run with
8 children?

9 A Yes.

10 Q They have ten children; is that right?

11 A Ten children: Five boys, five girls.

12 Q Okay. And where do you fit in in the whole clan?

13 A I'm number nine.

14 Q Number nine. All right.

15 A My mother had nine children in thirteen years, and
16 then eight years later, when she was forty-six, she had my
17 little sister.

18 Q And, so, you got to be the baby for --

19 A I was the baby for a long time.

20 Q Okay. And your dad and mom -- did your dad work at
21 the A&P forever or?

22 A For 35 years, yes.

23 Q And other odd jobs?

24 A Yeah. A lot of odd jobs. He was always working.
25 That's why he's living to 100 because he doesn't sit down.

26 Q He doesn't.

27 A Still doesn't sit down. He gardens, he bakes, he

1 cooks. He's amazing.

2 Q And what about -- what about the kids? What type of
3 environment did you grow up in? Was work part of your life?

4 A Crazy. You know.

5 Q Crazy.

6 A I know Francine was saying crazy fours, crazy ten.
7 Um, very close. Our family is very close. You know,
8 everybody lived at home. My oldest sister moved away when
9 she was 21, but other than that, everyone has lived in our
10 house. My parents bought a two-family house because the
11 only way they could afford a house, was if they had renters
12 over them. And we, you know, we had -- we had bedrooms in
13 the basement. You know, we just all managed. One
14 bathroom -- well, one and a half bathrooms. My father put a
15 bathroom in in the basement to help -- help us out.

16 Q Did you have to take a number? Like you could have
17 brought the thing --

18 So, I would infer that you shared a room with
19 your siblings your entire childhood?

20 A All -- yes. Different siblings. You know, I had a
21 room with my sister, Madeline, I had a room with my brother,
22 Jerry, I had a room with my sister, Christine. We would
23 switch it up.

24 Q Okay. And in terms of your -- I assume you went to
25 high school where, in the Bronx?

26 A Yes. My parents were very serious about us all going
27 to Catholic school. We all went to Catholic school. And

1 then pretty much after high school, it was, you know, you
2 made your decision. My father was on his own when he was
3 15, so I think they felt like after high school you decided
4 what you wanted to do. If you wanted to go to college, you
5 know, that was up to you. So, you know, some of my brothers
6 were police officers, and one brother was a fireman, and
7 somebody else worked for the MTA. I decided I wanted to be
8 a teacher. I always loved children. I took the first
9 semester off. I waitressed, and then I ended up going --
10 living at home and going to school in New York in Dobbs
11 Ferry Mercy College. And I just waitressed, and lived at
12 home, and went to school. It wasn't really a decision, it
13 was just something I always knew what I wanted to do. And
14 then went on, and I thought, I don't want to work and have
15 to go for my, you know, masters, so I continued to waitress,
16 and living at home, and I went and got my masters in
17 reading.

18 Q So, you did your full education before you started
19 teaching?

20 A Yes.

21 Q Is that what you are saying? Okay.

22 And the education, was that all at Mercy
23 College or?

24 A I also went to City College, Lehman College in the
25 Bronx.

26 Q Where is that, Bronx also?

27 A Yeah.

1 Q Did you ever get out of the Bronx?

2 A I lived in the Bronx until I was 30.

3 Q Okay. So I guess --

4 A Yeah.

5 Q And, now, did there -- and did you become a teacher
6 somewhere in New York City?

7 A I taught in the Bronx for years.

8 Q When did you start teaching? About how old were you?

9 A Twenty-seven maybe, twenty-six.

10 Q And what was the -- was it an elementary school?

11 A It was an elementary school in the Bronx. I started
12 at a second grade teacher. I continued to live at home, and
13 then became a reading teacher, and then ended up moving and
14 teaching -- well --

15 Q You are still teaching?

16 A Yes. I'm still teaching.

17 Q Let's just get to the foreshadow here.

18 A Yeah.

19 Q And at some point, did you meet a certain gentleman?

20 A I did.

21 Q Maybe that's a loose term --

22 A Yeah.

23 Q -- but you met a guy?

24 A Two teacher friends. They were a married couple,
25 used to talk about their friend that lived in Nashville,
26 Tennessee. And, you know, always talked so fondly of him.
27 And I went to a party. I was invited to a Labor Day weekend

1 party in New Rochelle, New York, and there was a great band,
2 and Mark was playing, and he was playing a lot of Grateful
3 Dead. I'm a big Grateful Dead fan.

4 Q Really? Full of surprises.

5 A And, I just -- I didn't even know he was the person
6 that they used to talk about. So, we got to talking that
7 night, and my family, my parents at this point had become
8 snow birds, and they were in Florida, and it turns out that
9 Mark had lived in the same town that my parents now/then
10 lived in, DeLand, Florida, which no one has ever heard of,
11 and I thought he was kind of pulling -- he thought I was
12 pulling his leg when I said that my parents lived in DeLand.
13 And we had a lot of other similarities. He ended up going
14 to Mercy College. He was there a little bit before me.
15 There were, you know, just a lot of coincidences. So, we
16 ended up talking, and he lived in Nashville, and we, I
17 guess, started dating, although he lived in Nashville and I
18 was in New York.

19 Q Now, so Mark is -- he was in the band, and what did
20 he play?

21 A He was a guitar -- he's a guitar player. He's a very
22 good guitar player.

23 Q Now, were you in a relationship at the time you met
24 Mark?

25 A I had just gotten out of a long-term relationship and
26 he had just gotten out of a long-term relationship.

27 Q And what was it about Mark that you found attractive

1 or attracted you to him?

2 A Mark was just different than anyone I had ever met.
3 He was really down-to-earth. We kind of laughed, because
4 one of the things I really liked about him is, he showed up
5 and he had a lunch box with his CDs in them. And I thought,
6 boy, he must be real he secure with himself that he can walk
7 around. I had dated somebody that was much more into, like,
8 everything had to be the best and, you know. Mark was just
9 so down-to-earth. What you saw was what you got, and I
10 just, immediately, fell in love with that.

11 Q And he played in a band, and he played the Grateful
12 Dead, so that probably didn't hurt; right?

13 So, tell us this -- you had a long distance
14 relationship with Mark for a while?

15 A Yeah. We dated for two years. It's funny, because I
16 just told my daughter this, like, in the last few months.
17 We dated, but we probably saw each other ten times, because
18 we would talk on the phone all the time, but he would come
19 home maybe once a month, or once every two months, and his
20 father had passed away right when I met him, so he would
21 spend a lot of time with his mother to just be with her.
22 So, I might see him for two hours or, you know, go out to
23 dinner, and he would have to go back, and he really was
24 attentive to his mother. And my daughter was, like -- you
25 know, he was in Nashville, and then we decided we wanted to
26 get married, and he moved back to New York -- and she said,
27 you married him and you hardly knew him. But we had spent

1 hours and hours on the phone. I mean, he would call me
2 after his gig. It might be 1:00 in the morning, and we
3 would talk until 5:00 in the morning, and then I would go to
4 work.

5 Q Which probably was like 6:00 in the morning.

6 But you stayed up to talk to Mark?

7 A Yeah. For hours.

8 Q So, you got married. Where did you get married?

9 A Well, when Mark moved back to New York, we ended up
10 moving in with my brother and his family in Yorktown Heights
11 in New York. We got married in Yorktown Heights.

12 Q And how long did you live -- how long was it between
13 then and having your first child?

14 A Child? We got married in '98. We met in '96. We
15 got married in '98, and then we had our first child, James,
16 in 2000. By that time, we had moved to Pawling. We bought
17 a townhouse in Pawling. I still worked in the Bronx.

18 Q Is that a long commute?

19 A It was like 60 miles. It was a long commute. It's
20 Dutchess County. So, we bought a townhouse in Pawling.
21 Because my sister lived in Connecticut, in Ridgefield -- two
22 sisters -- so we wanted to be close to them.

23 Q And how many -- when you moved out to Pawling --

24 A Pawling.

25 Q -- how many -- it was James is the oldest?

26 A We had James in 2000.

27 Q And then --

1 A And then we had Natalie in 2001.

2 Q And then, did another --

3 A And then we had Daniel in 2005.

4 Q Daniel was born. What was Daniel's birthday?

5 A September 27th.

6 Q And, so, his birthday would have been last week?

7 A Mm-hmm. He would have been 17.

8 Q Seventeen.

9 Now, can you just tell us how the Barden --
10 did you go by Gilbin[sic] at the time?

11 A Giblin?

12 Q Sorry.

13 A That's all right. No. No.

14 Q How did the clan end up, then, in Sandy Hook?

15 A Well, we lived in Pawling in a townhouse, and I
16 worked in Pawling. My sister, actually, lived in Ridgefield
17 and she -- her husband went to China for -- he worked for
18 IBN. He had a two year -- he went to China and we house sat
19 for them. So, we --

20 Q In Ridgefield?

21 A In Ridgefield.

22 Q So, we lived in their house and we were able to save
23 some money. You know, we knew that we wanted to move to
24 Connecticut. So, we lived there for two years. And then,
25 we just decided Ridgefield we couldn't really afford, and we
26 knew that Newtown had really good schools, so we decided
27 that we would, after the two years was up, we went to

1 Newtown. We moved to Sandy Hook.

2 Q Now, you were working full-time during this whole
3 time; right?

4 A Mm-hmm.

5 Q And you've got three little kids growing up, but
6 young kids. What's Mark doing?

7 A So, Mark actually was a stay-at-home dad. And he
8 worked -- you know, he played music at night.

9 Q Had he stopped going to Nashville and?

10 A Yeah. Well, he was home. Basically, what we would
11 do is, I would work during the day, I would come home, we
12 would have dinner together, and then Mark would --
13 sometimes he would have to travel into Manhattan. He had a
14 regular Tuesday night gig in Manhattan. On Wednesday night
15 he had a regular Wednesday night gig in Connecticut, in
16 Greenwich, and then he would pick up gigs from -- you know,
17 anybody that would hire him, he would take on the weekends.
18 And I know a lot of people used to say, that must be hard,
19 but we really felt like the kids had the best of it. He was
20 a great stay-at-home dad. I mean, he was -- he was so
21 attentive, and he would take them to museums. And Mark has
22 a lot of interests, so he would bring them to, you know --
23 you know, he's a big train guy. So, they would go look all
24 over for trains. He was, you know, always playing music
25 with the kids. He just was very hands-on and then he would
26 work at night. So, sometimes he would come home at 2:00 in
27 the morning and he would have to be up at 6:00 or 7:00,

1 ready with the kids, because I was going to work. But it
2 really worked for us because we felt the kids were getting
3 the best, and somehow we did get to spend a lot of time
4 together. You know, when he was home, we weren't watching
5 TV, we were hanging out together, talking. We would have
6 dinner together. I never felt like we were two ships
7 passing. You know, that expression? I never felt that. I
8 felt like we had a very strong relationship even though our
9 schedules didn't seem to jive.

10 Q And then can you tell us, you know -- you know that
11 Alex Jones said that Daniel never existed as (INDISCERNIBLE)
12 that you were actors, that you made the whole thing up
13 because you have some motive -- some kind of a motive, you
14 are fakes. So, can you just tell us a little bit of some
15 stories about Daniel. Just tell the jury a couple things
16 about Daniel?

17 A Daniel was our baby, and because of it, he got a lot
18 of attention from James and Natalie. And I think because of
19 that, he was this -- well, he was definitely your rough and
20 tumble. He was out there playing with the big boys. You
21 know, he would get a bloody lip, he didn't care. But, yet,
22 he was so compassionate, and thoughtful, and so aware of
23 others. It was -- sometimes Mark and I would say, where did
24 that come from. It was strange the way he was. Like, an
25 example would be, first day of, you know, school, when he
26 was in first day, they would come home. He would talk to
27 James, how was your first day? How was your teachers?

1 Q Daniel would talk to James or you would ask about
2 that?

3 A No. I would ask them. I would ask them questions
4 about their first day. You know, it's their first day of
5 class. How are your teachers? What are you thinking? And
6 James and Natalie always were, you know, you know,
7 everything is great, they liked their teachers. So, in
8 first grade, I asked Daniel, so what do you think of your
9 teacher this year? And he says, I'm not sure. And I said,
10 what do you mean you are not sure? And he goes, there was a
11 little girl that was playing with her barrette, or she had
12 it in her hand, and the teacher said, if you don't put that
13 away, I'm going to take it from you. And, I said, and? He
14 goes, don't you think that was a little threatening, mom?
15 He said, I just feel like she should have given her a
16 warning. He said, I really didn't like the way the teacher
17 talked to her. And I said, who is the little girl? And he
18 says, I don't even know her name. But he really was -- and
19 I just thought, what kid thinks like that? He's seven and
20 he is worrying about some little girl that he thought was
21 being threatened. And I had to explain to him, I'm a
22 teacher. I said, Daniel, everyone is a little nervous. The
23 teachers try to make the rules for the year and, you know,
24 don't be so hard on the teacher. And he's, like, okay, but
25 I just -- he really -- he felt that. He felt what that
26 little girl. You know, he didn't like that. He was always
27 like, you know, there would be a little bit of milk, he

1 wouldn't finish it. I would have to say some for the next
2 person. He was always worrying about making -- you know, he
3 would never go out the door first. You first. He was
4 always trying to put the people ahead of him.

5 ATTY. KOSKOFF: Can we show the jury some
6 pictures of this young gentleman? Let's show, first
7 five -- I'm going to move to admit it if there is no
8 objection. 584, 585, and 586. These are all just
9 photos?

10 ATTY. PATTIS: Correct, Judge. No objection.

11 ATTY. KOSKOFF: Can he we show them 586?

12 Q What, is everybody a Yankee fan? Oh, it's the Bronx,
13 right.

14 So, you got -- tell us who we are looking at
15 here?

16 A James, Daniel in the middle, and Natalie.

17 Q Okay. And do you know roughly when this picture
18 would have been taken?

19 A It was in -- I think it was in Stone Harbor. It was
20 probably in 2011, in the summer. Stone Harbor, New Jersey.

21 ATTY. MATTEI: And can we look at 585?

22 Q So, that's you and Mark?

23 A We were in our stairs. I don't really remember that
24 picture being taken. I've seen it, but I don't really
25 remember it being taken. I think it was probably, I'm
26 guessing, around the holiday of Thanksgiving when we had
27 family in 2012.

1 Q Of what year?

2 A We always did Thanksgiving. We hosted Thanksgiving.
3 My sister would host Christmas. And I think -- I think one
4 of my nieces took that, Mark probably remembers.

5 Q But you think it was Thanksgiving in 2012?

6 A Yes.

7 Q And Daniel's school -- obligatory school shot, I
8 think, 584? Wow.

9 A Yeah.

10 Q Was this a school picture?

11 A Yes.

12 Q For his first grade?

13 A Yeah.

14 Q All right. Now, Jackie, we are going to cover this
15 very lightly, okay.

16 I just want to ask you, you know, I know you are a
17 teacher, so you leave very early in the morning. When was
18 the last time that you saw Daniel alive?

19 A Well, I saw him briefly that morning. The night
20 before, Mark was working, Thursday night, so we spent time
21 together. We had our little routine. I would be cleaning
22 up the kitchen, and he would go up and pick three books, and
23 he would wait.

24 Q Who would, Mark or Daniel?

25 A No. Daniel would wait upstairs in bed for me. He
26 would pick his three books. I would go up and read to him.
27 So that Thursday, he went up to get his books, and I got

1 distracted and I got up there late, and it was, like, close
2 to 9 o'clock, and I would really try to get them in bed much
3 earlier than that. And I said, Daniel, I don't think we are
4 going to have time to read. And what he would always do,
5 every night, was he would hear me coming and he would stick
6 the three books under his pillow and he would lay there and
7 wait for me to come in. And I would say, where are your
8 books? And he would say, I forgot to get them. And then I
9 would put my head on pillow, and I would feel them, and he
10 would bust up laughing. He did this every night. So, that
11 happened. I said, but I said I don't think I'm going to
12 read to you tonight. It's so late. And he said, okay. And
13 I said, I'm so sorry. And he said, that's okay, mom. He
14 would never argue or never get mad. And I just said, okay,
15 I'll read one book.

16 Q You gave in?

17 A Because, it was so late. He was sniffing. Okay,
18 mom, you don't have to read to me. So, of course, I tried
19 to pick the shortest book. And he said, I read that while I
20 was waiting. And, so, I read him *The Principal's New*
21 *Clothes*, was the second shortest book. And we read the
22 book, or I read the book to him. And I remember hugging him
23 that night and it being -- I'm usually very distracted, and
24 trying to get everything done and, you know, thinking about
25 lunches tomorrow. And I used to always be envious of Mark
26 because he could really be in the moment, and he could
27 really take the kids in. But that night I do remember

1 thinking this is how it feels, because it was really the
2 first time I ever -- I don't know why -- I hugged him and I
3 really -- I thought, this is the way Mark feels every time
4 he hugs our kids because, I don't know, it's weird. So,
5 that was the last night I had with him. And in the morning,
6 I would get up earlier. And, usually, I would go downstairs
7 to blow my hair because I didn't want to make the kids. We
8 had a little bathroom. And that morning, he did come in to
9 me, in the bathroom. He really liked the heat. He would
10 want me to blow him with my hair dryer. So, he sat on the
11 toilet while I was doing my hair and was telling me about
12 his new reading partner that he had at school. They had
13 just changed reading partners.

14 Q And what were the plans for that weekend? Was he
15 scheduled to go to a birthday party?

16 A Daniel had a birthday party for go to. There was a
17 little girl in his class that was celebrating their
18 birthday.

19 Again, Mark was much more involved with the
20 school, and he knew the kids, and he knew the parents, and I
21 didn't.

22 Q Right.

23 A So, I remember that Thursday before asking Daniel
24 about this little girl and saying, like, so what do you play
25 with, you know, what do you do with her, what do you talk
26 about? And he said, oh, mommy, she doesn't talk. And I
27 said, what do you mean? And he said, she doesn't talk, but

1 she's really good at listening. He says, I talk to her. I
2 know she hears me. I mean, he just didn't think that she
3 was -- he just accepted what somebody was.

4 Q Mm-hmm.

5 And, I'm sorry to ask you that -- there,
6 obviously, came a time that you found out something had
7 happened at the school; is that right?

8 A I was in my second grade classroom. And, normally, I
9 turn my phone off, but for some reason it was ringing. And
10 it was -- I think a robo call. So, I called Mark and told
11 him that I had received a call, and he said I'll look into
12 it. And, then, I think I called him again and he was still
13 trying to figure out what was happening. And, then, at that
14 point, I was taken out of my classroom and I sat with my
15 principal. I didn't know how serious it was, so I didn't
16 leave right away. I remember thinking, initially, it must
17 be, like, the high school, maybe a parent was upset. And it
18 was -- you know, I didn't realize that it was in Daniel's
19 school. And then when I did find out it was in Daniel's
20 school, I'm such a denial person, that immediately I just
21 thought, he's fine, it's Daniel, he's different. I remember
22 saying that to my principal, Daniel is a different kid, you
23 know, he's going to be fine. It's --

24 Q Can you just tell us, what hours, if you were at the
25 firehouse, and just what hours you were there? If you
26 recall.

27 A I think I probably left the school at, like, I'm

1 guessing --

2 Q You are talking about your school where you worked?

3 A My school in New York, in Pawling, New York. It's
4 about 50 minutes away. I think I left there, at maybe
5 11:00. I don't really remember, and I think we were there
6 till, I'm guessing, 4:00 -- 3:00, 4:00. I don't, again --
7 it's -- everything is really a blur.

8 Q And, obviously, the plans changed and you had to
9 make accommodations for what happened. Do you want to give
10 us an overview of that?

11 A Of what happened after?

12 Q Well, you had to -- you had to make arrangements,
13 like, happened at the Barden household and?

14 A Well, we were driven home by, you know, a state
15 trooper, and our kids, Natalie and James, were at a
16 neighbor's house. So --

17 Q All right. Were they in the school?

18 A No.

19 Q They were older?

20 A They were in different schools. They were each in a
21 different school. Newtown has intermediate and then middle
22 school.

23 So, people started coming to our house. By,
24 you know, 6 o'clock, our house was filled with people. And
25 then we had to get Natalie and James and tell them.

26 Q Now, Jackie, did -- and did there come a time when
27 you became aware of something happening in the community, or

1 the world, or your world, that was related to something
2 about you being an actor, a fraud, a faker, something along
3 those lines?

4 A I don't know the sequence of events. I remember when
5 hearing about Robbie being attacked -- Robbie Parker.

6 Q Who told you?

7 A I don't remember. I just -- I was aware. I don't
8 know if I saw it on television, or I read it, or someone
9 told me. I just remembered thinking, how can that be.

10 Q And you know from, at least from being in court, that
11 Infowars was on the air on the 15th attacking Robbie Parker?

12 A I don't really remember.

13 Q You never knew that; right?

14 A I just remember someone attacking Robbie Parker. I
15 also remember Mark had a -- Mark being a musician, he had a
16 MarkBarden.com. It was his music post. It was basically if
17 anyone wanted to find out where he was playing, or he would
18 put snippets of music on. And I remember him getting upset
19 because people starting coming onto his music page and
20 making statements about being phony, and actor. And a lot
21 of this stuff he kept from me, so I would get little
22 snippets of just what he was going through. I also started
23 becoming aware he had YouTube channels, and that was another
24 place that, you know, he would post the kids playing
25 together. Being that he -- you know, music was so important
26 to him, Natalie sang, Danny was the little drummer, and
27 James played base. And he would post things on his YouTube

1 channel. And nobody ever commented. It was basically for
2 friends and family. It wasn't anything. But he started
3 getting attacked on that.

4 Q And did you -- you described Mark. I'm picturing a
5 Grateful Dead guitar player and a pretty --

6 A Mark is like the calmest person.

7 Q Okay. And did you notice a change in Mark's behavior
8 or personally?

9 A Yes. Definitely.

10 Q Can you tell the jury about that?

11 A Well, I mean, he would get really angry when he would
12 find these comments. You know, here they were saying that
13 Daniel was -- I mean, they were different things. Daniel
14 was never -- never existed. Our son, James, was Daniel, and
15 we are trying to, you know, pretend that we had a loss, or
16 some people would write about that we killed Daniel. I
17 mean, it was crazy stuff that they were posting. And Mark
18 would just get really angry and, you know, he started
19 becoming, like -- you know, we moved to Connecticut, we
20 wanted to get out of the city. We used to, like, leave our
21 windows open. That stopped. It was, like, the windows were
22 down at night especially. He would put the blinds, he would
23 close the curtains. He was always afraid somebody was going
24 to be looking in the house. You know, when we would go
25 shopping, he would, you know, be scanning and looking around
26 to see if anybody looked at him in a weird way. You know, I
27 used to -- you know, we used to kind of, I mean, not get

1 into a fight, but I would say, like, we need to go and buy
2 this, like, you are preoccupied. He would become
3 preoccupied with worrying about who is around him.

4 Q Was this like him or was this --

5 A No, no.

6 Q -- something that you hadn't observed before?

7 A He was, like you said, a Grateful Dead, peace, love.
8 I me, he's very protective of his family. I mean, very
9 protective. So, I felt -- I think he felt like he had to
10 protect us, and he was always -- especially if he was with
11 James and Natalie, like, Natalie would even know because she
12 would say, like, oh, I don't want to go to the store, or I
13 don't want to do this, because she was afraid that he might
14 be -- she could tell the difference in him too.

15 Q So, the kids started -- or at least Natalie, you
16 say, started to notice a difference in the behavior of their
17 dad?

18 A I think so. I definitely think that -- he was --
19 he's hypervigilant. He's always just very aware of his
20 surroundings. Just the other day, we were driving into our
21 neighborhood, and there was a car in front of us, and he
22 slows down because he wants to see where the car is going,
23 if they are going to slow down by our house. You know, he
24 slowed down. They passed our house and then it was fine,
25 but he was aware of that car.

26 Q Did you and Mark get threatening letters or letters
27 that gave you concern for your safety?

1 A Yeah. There was letters. Again, he didn't show me a
2 lot of stuff, so I'm not sure exactly. But there were
3 letters.

4 Q Do you know whether -- and Mark is going to testify.
5 He's going to -- he's the last plaintiff to testify this
6 afternoon in the case, but he's going to testify. But to
7 your understanding, did Mark -- was Mark engaged in law
8 enforcement in relationship to the threats he was getting
9 online or did he keep that from you?

10 A No. I mean, I know that he did show me one letter,
11 and it talked about -- well he showed me maybe two. I'm not
12 sure. I remember one saying that they were at Daniel's
13 grave, and they had peed on his grave, because they didn't
14 think anybody -- you know, they didn't believe that Daniel
15 was buried. And another letter --

16 Q These letters came to your home?

17 A What's that?

18 Q These letters came to your home?

19 A Yeah. And then another letter was that they are
20 going to -- they were going to dig Daniel's grave up,
21 because he wasn't there, to prove it. So, those were two
22 that I know. I don't know other stuff. I know my sister
23 has gone to Daniel's grave and she'll -- has pulled up, and
24 people will --

25 ATTY. PATTIS: Objection. Hearsay, Judge.

26 THE COURT: Okay.

27 Q Well, but now you --

1 THE COURT: Overruled.

2 Q Go ahead. You can continue, Jackie. You can
3 continue.

4 A She has pulled up, and people will leave his grave.
5 And she'll say, you know, she had a bad feeling. She would
6 share with us that she had -- it was an uncomfortable
7 situation.

8 Q And did you and Mark take steps to protect the
9 children from becoming aware of these threatening letters
10 and other hostile --

11 A We really tried to not share any of that with them.

12 Q Okay.

13 A We --

14 Q Sorry. Go ahead.

15 A No. I was just going to say, we tried to make our
16 household as happy and light as possible. They had just
17 lost their brother and we -- you know, we really tried to
18 hold it together. I remember saying, like, they have to
19 have a happy childhood. We had worked so hard at that and
20 we didn't want that to be taken from them, so we really,
21 kind of, protected them from a lot of stuff.

22 Q And, so, the shooting had occurred, and now you were
23 protecting -- you had to protect them from this other forces
24 out there, people infected with these lies who believed you
25 were so despicable that you would fake your own kid's death?

26 A Right. Yeah. It was enough that they lost their
27 brother, that they didn't really need to know, then, that

1 their father was being attacked, and that we were being
2 accused. I mean, I did remember seeing -- looking on --
3 and I don't know what the web page was, but there was a web
4 page that, you know, it was pictures of the three of them.
5 And they would always -- they would circle James and say
6 this is, you know, really Daniel. And there was another
7 picture of my sister, and her husband, and Daniel, and we
8 would go to my sister's house for dinner. And, you know,
9 this person isn't real, and this is -- and that was another
10 website that I remember coming across.

11 Q Can I ask you about -- I think I'm getting the
12 impression that you are not as -- don't have as much of an
13 online presence as some other people?

14 A No. I mean, I have Facebook, but that's it. My
15 niece started a page for our son, Daniel, *What Would Daniel*
16 *Do*, probably, like, in January of 2013.

17 Q And tell us about that? Have you -- are you
18 actively -- review that?

19 A No. Yes. It's -- well, it started with her -- my
20 niece has a 16 -- at the time, her daughter was 16, and the
21 daughter was in high school, and this was somebody that was
22 kind of a loner. And her niece -- her daughter said, what
23 would Daniel do if he saw somebody that was alone? So, she
24 went up to him and had a very short little conversation just
25 checking in. You know, hi, I'm Mariah, and they spoke, and
26 she went about her day, and later in the day, this boy came
27 up to her and said, thank you. Thanks for just saying hello

1 to me. You know, it meant a lot. So, Mariah went back to
2 her mother and said this, and my niece said -- Mariah said,
3 I thought of Daniel, and I kind of reached out. So, Jackie
4 started this Facebook page, and it was all about kindness,
5 and including others, and telling stories of Daniel, and all
6 these things that he would do, pictures of him, pictures of
7 the family. It was just -- so Jackie started saying that
8 there are some people on there that would make comments, and
9 she was very good about -- she would just block them. She
10 had to block over 100 people.

11 Q They hit that pretty hard, didn't they?

12 A Yeah. There is an awful lot of nice, good, caring
13 people. She would always highlight that. Jackie, there is
14 so many good people out there --

15 Q Right.

16 A -- and you just -- but it was over 100 times that
17 she would block -- had to block people.

18 Q And that was back then at some point you got that
19 count. Is *What Would Daniel Do* still up and running?

20 A Yes.

21 Q And does that give you comfort in terms of being a
22 memory of Daniel?

23 A Sure. Yes.

24 Q Pretending that I saw the time but I can't see it.

25 So, and thank you, Jackie, for describing your
26 observations about Mark, about this difficult time.

27 I want to ask you something about your

1 children, though.

2 You said Mark was very protective. I'm
3 guessing you are a close second?

4 A Yeah.

5 Q Can you tell us, are your children, James and
6 Natalie, tell us a little bit, are they the same kind of
7 person? Are they different? Do they --

8 A They are different. James is -- he's in his last
9 year of college now. He's kind of quiet, to himself. I
10 mean, that -- I don't know. He's a typical boy. You know,
11 nothing kind of -- he doesn't get too ruffled by things.
12 Although, he did get a phone call from someone late at night
13 on his phone when he was in college, and it turned out to be
14 a hoaxer in Utah. We don't know how they got his phone.
15 So, he called Mark. I'm not really even sure how that --
16 what went on, but he called Mark and --

17 Q What's that like as a parent? Is that -- was that
18 distressing?

19 A Oh, terrifying. And for them to -- and they spoke to
20 him, and he didn't realize, even, who they were. They were
21 trying to -- you know, they were asking him questions, and
22 he, being polite, he was answering questions. And then he
23 called Mark and said it was kind of strange somebody called
24 me late at night, they said that they knew you, and I think
25 Mark kind of found out who they were, and --

26 Q So, Mark dealt with that with James?

27 A So, Mark dealt with that.

1 Q Now, you have -- Mark has a relationship with both
2 James and Natalie, but when Natalie calls, does she --

3 A She has a very good relationship with Mark, but she
4 definitely comes, you know, she tells me more of her
5 personal things. She's --

6 Q And how old is Natalie now?

7 A Natalie is 20.

8 Q And so how old -- so, she would have been, like,
9 10 -- or 10 or 11 at the time?

10 A Ten.

11 Q And she's in college; right?

12 A She's in college.

13 Q You don't have to say where, by the way. I know that
14 you are anxious about that.

15 A Yeah.

16 Q But can you tell the jury, from your observations, as
17 Natalie's mother --

18 A How she does?

19 Q Right.

20 A She has a lot of anxiety. She has a lot of fear.
21 You know, when she's at home -- well, I mean, going back,
22 while she was in high school, when she would be at home, if
23 Mark and I went out to dinner, she would be calling us.
24 When are you coming home? When are you coming home? If
25 she's home by herself, she's really, really stressed. She
26 won't, like, would never take a shower if she was the only
27 person in the house because she's very afraid of being home

1 alone. She'll -- she'll look out just to watch for cars.
2 Even when we are watching TV, she'll say, did you hear that?
3 She's, like, check to see if there is a car. She's always
4 afraid a car is going to be pulling into our driveway.

5 Q Was she like this before you and others were being
6 accused of being actors and faking?

7 A No.

8 Q Okay. So, it was only --

9 A I don't know when it started, but it was a gradual
10 thing. One time, we had a light out by our driveway and
11 somebody was coming in, you know, pulled up, and they
12 wanted -- I guess they thought that the light was shining
13 too brightly, and it was distracting, and they just wanted
14 to let us know, you know, maybe you should move that light.
15 And she went nuts, like, freaked out. It was dark. Don't
16 get the door, don't get the door. She was afraid that
17 somebody was coming for us.

18 Q And do you know how she became aware of what was
19 going on out there? You guys tried to protect her, right?

20 A We did. You know, we didn't even think she was going
21 to go to college. We knew that she was going to go to
22 college, but we were afraid that she wasn't going to be able
23 to handle being away, and it was heartbreaking to learn that
24 she realized when she went to college, she felt better. She
25 said, when I come home, I'm afraid. When I'm in college,
26 nobody knows who I am. And we felt terrible. We thought we
27 should have moved because we always -- we didn't realize

1 that. We really didn't at the time until -- and I don't
2 think she realized that. She didn't realize until she went
3 away that she was better in college. She'll say, I feel
4 better when I'm at a friend's house because nobody knows who
5 I am, but when I'm home, I feel like I'm a target.

6 And we even -- we did think about moving, but
7 the kids really wanted to stay in the house, but I don't --
8 it was, like, we didn't know what to do.

9 Q So, she's not as comfortable in her own home as she
10 is --

11 A No.

12 Q -- at college, because she can be more anonymous
13 in --

14 A Yes. Definitely.

15 Q Wow.

16 A So, we --

17 Q Was that -- is that hard on you --

18 A Oh, it's terrible. It's terrible to think your
19 20-year old daughter is so afraid that -- or that when she
20 comes home she's so afraid.

21 Q And, Jackie, thank you again. Did you recently learn
22 that despite your best efforts to protect Natalie --

23 A Yeah, well --

24 Q -- that something had happened?

25 A We always thought that she didn't know a lot of this
26 stuff, but our phones are connected weird. I don't know --
27 I don't really understand technology, but I think we have

1 the same Apple ID. So, a lot of times, like, Mark's phone
2 will ring and it will be Natalie's friend on the phone. You
3 know, he can see Natalie's, and he's, like, oh, that call is
4 for her. And she just told us a few weeks ago, she said, I
5 remember seeing -- you know, Mark took a photo of the letter
6 saying that they wanted to dig Daniel's grave up, and she
7 had seen it on her phone -- on the phone. And we didn't
8 know. She never told us, but she said, I knew that dad was
9 getting threats, but we didn't know that she knew.

10 Q You didn't know that until two weeks ago?

11 A Yeah.

12 Q She kept that --

13 A Yeah. We didn't know. But she just kind of matter
14 of factly said, oh yeah, I knew that he was getting threats.
15 I remember seeing it on the phone about that letter.

16 Q And she kept that from you for years? She didn't
17 tell you?

18 A No. We were both shocked when she told us that she
19 knew about that letter.

20 Q As a parent, were you -- were you --

21 A Oh, heartbreaking. That's all you want to do is
22 protect your child.

23 Q And she was trying to protect you?

24 A Yeah.

25 Q Okay.

26 ATTY. KOSKOFF: No further questions.

27 Thank you, Jackie.

1 THE COURT: Attorney Pattis?

2 ATTY. PATTIS: No questions, Judge.

3 THE COURT: All right. You have may step down.

4 THE WITNESS: Thank you.

5 THE COURT: Just watch your step.

6 So, this is good timing. We will take our hour
7 lunch. You will return at 2 p.m.

8 If you are going out, I don't know what the
9 weather is like out there but, boy, it looks pretty
10 windy. The trees are blowing. Just be careful to
11 avoid the front steps of the courthouse. There may
12 be media or press coverage there, and I certainly
13 want to make sure that you don't overhear anything
14 that you shouldn't be overhearing so we can avoid any
15 problems like that. I know you have the entrance
16 that you come in and out, so try to steer clear of
17 the front steps of the courthouse. You'll continue
18 to obey your rules of juror conduct.

19 And Ron will collect your notepads.

20 And I hope you have a nice lunch.

21 Take a recess.

22 (JURY EXIT).

23 (LUNCH RECESS)

24

25

26

27

1 X06-UWY-CV18-6046436-S : SUPERIOR COURT
2 ERICA LAFFERTY : COMPLEX LITIGATION DOCKET
3 v : AT WATERBURY, CONNECTICUT
4 ALEX EMRIC JONES : OCTOBER 4, 2022
.....
5 X06-UWY-CV18-6046437-S : SUPERIOR COURT
6 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
7 v : AT WATERBURY, CONNECTICUT
8 ALEX EMRIC JONES : October 4, 2022
.....
9 X06-UWY-CV18-6046438-S : SUPERIOR COURT
10 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
11 v : AT WATERBURY, CONNECTICUT
12 ALEX EMRIC JONES : October 4, 2022

13 C E R T I F I C A T E
14

15 I, Linda A. Coon, hereby certify that this is a true
16 and accurate transcription of the above-referenced case,
17 heard in Superior Court, Judicial District of Waterbury,
18 Connecticut, before the Honorable Barbara N. Bellis, on this
19 4th day of October, 2022.
20

21 Dated this 5th day of October, 2022, in Waterbury,
22 Connecticut.
23

24 

25 Linda A. Coon, RPR
26 Court Monitor/ Court Reporter
27

1 X06-UWY-CV18-6046436-S : SUPERIOR COURT
2 ERICA LAFFERTY : COMPLEX LITIGATION DOCKET
3 v : AT WATERBURY, CONNECTICUT
4 ALEX EMRIC JONES : OCTOBER 4, 2022

5
6 X06-UWY-CV18-6046437-S : SUPERIOR COURT

7 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
8 v : AT WATERBURY, CONNECTICUT
9 ALEX EMRIC JONES : OCTOBER 4, 2022

10
11 X06-UWY-CV18-6046438-S : SUPERIOR COURT

12 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
13 v : AT WATERBURY, CONNECTICUT
14 ALEX EMRIC JONES : OCTOBER 4, 2022

15
16 E L E C T R O N I C C E R T I F I C A T E

17 I, Linda A. Coon, hereby certify that this is a true
18 and accurate electronic version of the above-referenced
19 case, heard in Superior Court, Judicial District of
20 Waterbury, Connecticut, before the Honorable Barbara N.
21 Bellis, on this 4th day of October, 2022.

22 Dated this 5th day of October, 2022, in Waterbury,
23 Connecticut.

24
25 

26 Linda A. Coon, RPR
27 Court Monitor/ Court Reporter